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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION AND AGREEMENT FOR
ORDER ADDING THE UNITED STATES OF
AMERICA AS PARTIES TO
CONFIDENTIALITY AND PROTECTIVE
ORDER [DOCKET NO. 3405] AS MODIFIED
HEREIN**

[No hearing requested]

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”), on the one hand, and the United States of America, on behalf of the United States Department of Agriculture, United States Forest Service; the United States Department of the Interior, Bureau of Land Management, Bureau of Indian Affairs, Fish and Wildlife Service, and the National Park Service; the Small Business Administration, and the Department of Homeland Security, Federal Emergency Management Agency (together, the “**U.S. Agencies**”), on the other hand. The Debtors and the U.S. Agencies are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.**”** The Parties hereby stipulate and agree as follows:

RECITALS

A. The U.S. Agencies desire to be parties to the Confidentiality and Protective Order entered by the United States Bankruptcy Court for the Northern District of California on August 7, 2019 in *In re PG&E Corp., et al.*, Case No. 3:19-bk-30088 at Docket No. 3405 (the “**Order**”), with certain modifications, to which the Debtors have agreed.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT THE ORDER BE MODIFIED AS FOLLOWS:

1. Treatment of Protected Material by the United States. Nothing in the Order supersedes the U.S. Agencies' law enforcement, national security, or regulatory obligations regarding the disclosure of information required by applicable federal law.
 2. Freedom of Information Act Requests. The provisions of paragraph 8 of the Order shall apply to requests made to the U.S. Agencies pursuant to the Freedom of Information Act, 5 U.S.C. § 552, et seq.
 3. Congressional Requests. The Order shall not prevent or limit the U.S. Agencies' ability to provide Protected Material to the United States Congress pursuant to a Congressional request. The United States will use reasonable efforts to notify the Designating Party of such request if, and only if, the requesting Congressional party does not object to such notification.

1 Dated: November 12, 2019
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3

KELLER & BENVENUTTI LLP

4 /s/ Jane Kim

5 Jane Kim

6 Attorneys for Debtors
and Debtors in Possession

THE UNITED STATES OF AMERICA

7 /s/ Danielle A. Pham

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